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Attorneys for GEICO ADVANTAGE  
INSURANCE COMPANY erroneously sued and  
served herein as GEICO INSURANCE  
COMPANY

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA, SOUTHERN DIVISION

JUAN IBARRA, individually,  
Plaintiff,

v.

GEICO INSURANCE COMPANY, an entity  
licensed to do business in the State of Nevada;  
DOES I through V; and BUSINESS  
ENTITIES I through V, inclusive,  
Defendants.

Case No. 2:20-cv-00703-JCM-BNW

**STIPULATION AND ORDER TO  
DISMISS THE SECOND, THIRD AND  
FOURTH CAUSES OF ACTION IN  
PLAINTIFF'S COMPLAINT WITHOUT  
PREJUDICE AND TO WITHDRAW  
DEFENDANT'S MOTION TO DISMISS,  
OR IN THE ALTERNATIVE, TO  
SEVER/BIFURCATE AND TO STAY  
CLAIMS FOR BAD FAITH AS MOOT**

Both parties, by and through their counsel of record do hereby stipulate as follows:

**IT IS HEREBY STIPULATED** that the second, third and fourth causes of action in  
Plaintiff's Complaint be dismissed without prejudice;

**IT IS FURTHER STIPULATION** that in light of the parties' Stipulation to Dismiss the

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Case No. 2:20-cv-00703-JCM-BNW

STIPULATION AND ORDER TO DISMISS THE SECOND, THIRD AND FOURTH CAUSES OF ACTION IN  
PLAINTIFF'S COMPLAINT WITHOUT PREJUDICE AND TO WITHDRAW DEFENDANT'S MOTION TO  
DISMISS, OR IN THE ALTERNATIVE, TO SEVER/BIFURCATE AND TO STAY CLAIMS FOR BAD FAITH  
AS MOOT

1 second, third and fourth causes of action without prejudice that GEICO's Motion to Dismiss, or in the  
2 Alternative, to Sever/Bifurcate and to Stay is moot and is therefore withdrawn.

3 DATED this 7<sup>th</sup> day of May, 2020

4 GREENMAN GOLDBERG RABY & MARTINEZ

5  
6 By /s/ William Martin

7 Gabriel A Martinez, Nevada Bar No. 326  
8 Dillon G. Coil, Nevada Bar No. 11541  
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13 Attorneys for Juan Ibarra

14 DATED this 7<sup>th</sup> day of May, 2020

15 McCORMICK, BARSTOW, SHEPPARD,  
16 WAYTE & CARRUTH LLP

17 By /s/ Wade M. Hansard

18 Wade M. Hansard, Nevada Bar No. 8104  
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23 Tel. (702) 949-1100  
24 Attorneys for GEICO ADVANTAGE  
25 INSURANCE COMPANY, erroneously sued and  
26 served as GEICO INSURANCE AGENCY, INC.

27 **ORDER**

28 IT IS SO ORDERED.

DATED May 8, 2020.

By 

UNITED STATES DISTRICT COURT JUDGE

6817523.1